

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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BETANCOURT PROPERTIES MANAGEMENT CORP.  
and RENEWAL ARTS REALTY CORP.,

Plaintiffs,

**Response to Defendant's  
Rule 56.1 Statement**  
07-cv-11047 (TPG)

-against-

SIMPLEX GRINNELL LP a/k/a and/or d/b/a  
SIMPLEX GRINNELL or TYCO/FIRE &  
SECURITY/SIMPLEX GRINNELL,

Defendants.

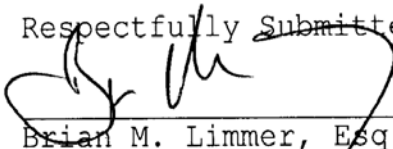
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2. The contract signed by Plaintiffs and Defendant contains a provision excluding the recovery of consequential damages under certain circumstances not relevant to this case, and that provision does not, as defendant claims, apply to a breach of the contract as alleged by plaintiffs.

Dated: April 23, 2008

Respectfully Submitted,

BY:

  
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